

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

*

Criminal No. JFM-13-0678

MICHAEL LEE

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MOTION TO ADOPT MOTIONS FILED BY CO-DEFENDANT

Defendant Michael Lee (“Mr. Lee”), by and through his undersigned counsel, James Wyda, Federal Public Defender for the District of Maryland, and Premal Dharja and Brendan Hurson, Assistant Federal Public Defenders, hereby moves this Honorable Court for leave to adopt all motions filed by his co-defendant in this matter:

1. Mr. Lee is charged via superseding indictment with one count of the use of an interstate facility to promote and facilitate a prostitution business, in violation of 18 U.S.C. § 1952(a); one count of conspiracy to commit sex trafficking, in violation of 18 U.S.C. § 1594; two counts of interstate transportation for prostitution, in violation of 18 U.S.C. § 2421(a); two counts of sex trafficking by force, fraud and coercion, in violation of 18 U.S.C. § 1591; one count of coercion and enticement, in violation of 18 U.S.C. § 2422(a); and aiding and abetting, in violation of 18 U.S.C. § 2. Co-defendant Robert Downing is charged alongside Mr. Lee in counts one and two of the superseding indictment.

2. Mr. Lee has already filed pre-trial motions and intends to file additional motions before the December 12, 2014, deadline for filing.

3. Counsel for Mr. Downing has already filed several pre-trial motions as well and has indicated to the undersigned that he, too, may file additional motions prior to the deadline.

4. To conserve resources and streamline the issues before the Court, we move to adopt all pre-trial motions filed by counsel for Mr. Downing, unless otherwise indicated in a subsequent filing.

WHEREFORE, Mr. Lee requests that this Honorable Court allow him to adopt all motions filed by counsel for co-defendant Robert Downing.

Respectfully submitted,

JAMES WYDA
Federal Public Defender

/s/

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